

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>As representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i></p> <p>Debtors.¹</p>	<p>PROMESA</p> <p>Title III</p> <p>No. 17-BK-3283 (LTS)</p> <p>(Jointly Administered)</p>
<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>As representative of</p> <p>PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY,</p> <p>Debtor.</p>	<p>PROMESA</p> <p>Title III</p> <p>No. 17-BK-3567 (LTS)</p>

RESERVATION OF RIGHTS
OF THE UNIVERSITY OF PUERTO RICO RETIREMENT SYSTEM TRUST

TO THE HONORABLE COURT:

COMES NOW creditor University of Puerto Rico Retirement System Trust (the “Trust”),

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686).

through the undersigned counsel, and respectfully states and prays as follows:

1. On October 19, 2021, the Trust filed an Objection to Plan Confirmation. See Docket No. 18753.

2. On October 27, 2021, Debtors filed an Omnibus Reply to Objections to Plan Confirmation (“Omnibus Reply”). See Docket No. 18874. In the Omnibus Reply, Debtors indicated that the Trust’s claim 93752 would be transferred into Administrative Claims Reconciliation (“ACR”) and that for said reason the Trust’s claim is not being treated pursuant to the Plan.

3. On October 29, 2021, Debtors filed the Nineteenth Notice of Transfer of Claims to Administrative Claims Reconciliation through which the Trust’s claim was officially transferred into ACR. See Docket No. 18956.

4. Recently, the Financial Oversight and Management Board of Puerto Rico (“FOMB”) announced that the Plan will be amended. However, to date said amendment has not been filed with the Court.

5. In light of the foregoing, the Trust hereby files this Reservation of Rights in an abundance of caution. Specifically, the Trust reserves the right to object the Plan—as such Plan may be amended—to the extent that the amendment to the Plan directly or indirectly affects the Trust’s claim.

WHEREFORE, the University of Puerto Rico Retirement System Trust respectfully requests that the Court take note of the above reservation of rights.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3rd day of November 2021.

WE HEREBY CERTIFY that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record. I also hereby certify that the foregoing was served pursuant to the Fifteenth Amended Notice, Case Management and Administrative Procedures Order (Docket No. 17127).

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